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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re: | : Chapter 11 |
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| CM WIND DOWN TOPCO INC., | : Case No. 17-13381 (SCC) |
| | : |
| Reorganized Debtor.¹ | : |
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**NOTICE OF FILING OF MOTION OF THE REORGANIZED DEBTOR
TO (I) ENJOIN PLAINTIFFS FROM CONTINUING TO PROSECUTE A
COMPLAINT IN VIOLATION OF THE PLAN DISCHARGE INJUNCTION
AND (II) HOLD PLAINTIFFS IN CONTEMPT FOR VIOLATION OF
THE PLAN DISCHARGE INJUNCTION**

PLEASE TAKE NOTICE that CM Wind Down Topco Inc. (formerly known as Cumulus Media Inc.) (the “Reorganized Debtor”), on behalf of itself and its affiliates that were formerly debtors in the above captioned case (each such affiliate, a “Former Debtor” and collectively, together with the Reorganized Debtor, the “Reorganized Company”) filed the *Motion of the Reorganized Debtor to (I) Enjoin Plaintiffs from Continuing to Prosecute a Complaint in Violation of the Plan Discharge Injunction and (II) Hold Plaintiffs in Contempt for Violation of the Plan Discharge Injunction* [ECF No.1030] (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, in Room 623 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 on **December 4, 2018 at 2:00 P.M.** (prevailing Eastern Time), or as soon thereafter as counsel may be heard.

¹ The last four digits of the Reorganized Debtor’s tax identification number are 9663. The location of the Reorganized Debtor’s service address is: 3280 Peachtree Road, N.W., Suite 220, Atlanta, Georgia 30305.

PLEASE TAKE FURTHER NOTICE that any objection (“Objection”) to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the *Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c), 2002(m), and 9007 Implementing Certain Notice and Case Management Procedures* [ECF No. 73] (the “Case Management Order”) and shall be filed with the Bankruptcy Court (a) by registered users of the Bankruptcy Court’s case filing system, electronically in accordance with General Order M–399 (which can be found at <http://www.nysb.uscourts.gov>) and (b) by all other parties-in-interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers as set forth in the Case Management Order), in accordance with the customary practices of the Bankruptcy Court and General Order M–399, to the extent applicable, and served so as to be actually received no later than **November 27, 2018 at 4:00 p.m. (EST)** (the “Objection Deadline”) on: (i) counsel to the Reorganized Debtor; (ii) the Office of the United States Trustee for the Southern District of New York; and (iii) the other Core Parties as defined in the Case Management Order.

PLEASE TAKE FURTHER NOTICE that the hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates in open court at the hearing.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these chapter 11 cases may be obtained free of charge by visiting the website of Epiq Bankruptcy Solutions at <https://dm.epiq11.com/#/case/CUI/info>. You may also obtain copies of any pleadings by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fee set forth therein.

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PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Reorganized Debtor may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard.

Dated: October 29, 2018
New York, New York

PAUL, WEISS, RIFKIND, WHARTON
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/s/ Paul M. Basta

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